

EXHIBIT 1

lawsuit. That list includes information for over 4,000 individual healthcare claims that Plaintiffs submitted to Humana for payment that Plaintiffs contend Humana underpaid. On December 13, 2018 and December 14, 2018, Plaintiffs, through counsel, provided this claims spreadsheet to Humana, through counsel.

4. Plaintiffs do not, and will not, seek any relief in this lawsuit with respect to any individual healthcare claims where Humana denied coverage of the claim based on the terms of a plan. For healthcare claims where Humana denied coverage for individual charges based on the terms of a plan (but not the entire claim), Plaintiffs do not, and will not, seek any relief relating to the individual charges that Humana denied coverage for.

5. Additionally, Plaintiffs do not, and will not, seek any relief in this lawsuit with respect to services provided to patients that would be payable by Humana's Medicare Advantage health plans. Plaintiffs expressly disclaim any of their claims in this action that arise from Medicare Advantage plans.

6. Finally, Plaintiffs do not, and will not, seek any relief in this lawsuit with respect to services provided patients that would be payable by Humana's Federal Employee Health Benefit Act ("FEHBA") plans. Prior to Humana's filing of its Notice of Removal, Plaintiffs were not aware that any of the claims at issue were for FEHBA members. Plaintiffs expressly disclaim any of their claims in this action that arise from FEHBA plans.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 14, 2019, in KNOXVILLE, TN.


Kent Bristow